

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
JAENEAN LIGON, et al. : **NOTICE OF PLAINTIFFS'**
: **MOTION IN LIMINE**
:
Plaintiffs, :
: 12 Civ. 2274 (SAS)(HBP)
-versus- :
:
CITY OF NEW YORK, et al. :
:
:
Defendants. :
-----X

PLEASE TAKE NOTICE that upon the accompanying Declaration of Daniel Mullkoff and memorandum of law, the plaintiffs will move before the Honorable Shira A. Scheindlin, United States District Court Judge for the Southern District of New York, for an order precluding the defendants at the preliminary injunction hearing in this action, beginning on October 15, 2012, from (a) offering evidence or cross-examining the plaintiffs and plaintiffs' non-party witnesses about their arrest histories; (b) offering evidence or cross-examining the plaintiffs and plaintiffs' non-party witnesses about past criminal convictions; (c) offering evidence or cross-examining Plaintiff Charles Bradley about his relationship with his ex-fiancee, Lisa Rappa; and (d) cross-examining non-party witness Anginette Trinidad about her past drug use.

Respectfully submitted,

s/ Alexis Karteron

Alexis Karteron
Christopher Dunn
Taylor Pendergrass
Daniel Mullkoff
New York Civil Liberties Union Foundation
125 Broad Street, 19th Floor
New York, New York 10004
(212) 607-3300
akarteron@nyclu.org

J. McGregor Smyth, Jr.
Mariana Kovel
The Bronx Defenders
860 Courtlandt Avenue
Bronx, New York 10451

Juan Cartagena
Foster Maer
Roberto Concepcion
LatinoJustice PRLDEF
99 Hudson Street, 14th Floor
New York, New York 10013

John A. Nathanson
Tiana Peterson
Mayer Grashin
Shearman & Sterling LLP
599 Lexington Avenue
New York, New York 10022

Attorneys for Plaintiffs

Dated: October 1, 2012
New York, New York